



THE LAW OFFICE OF  
**MATTHEW GALLUZZO**  
PLLC

11 BROADWAY, SUITE 715      NEW YORK, NEW YORK 10004  
Tel. (212) 344-5180      [www.criminal-defense.nyc](http://www.criminal-defense.nyc)

October 19, 2021

The Hon. John P. Cronan  
U.S. District Court Judge  
Southern District of New York  
VIA ECF

Re:      *U.S. v. Lazaro Rosabal Fleitas*, 19-cr-631

Dear Judge Cronan,

My client and I appeared before Your Honor for sentencing on September 17, and the Court sentenced my client to 30 months in prison with a surrender date of November 29, 2021. My client now respectfully requests that you amend the judgment with respect to the surrender date.

The Court was kind enough to extend its originally intended surrender date until after Thanksgiving so that my client could spend that holiday with his family. However, my client has two daughters whose birthdays are December 17 and January 8. My client respectfully asks the Court to consider postponing the surrender so that he may spend these birthdays with his children prior to his surrender. My client has been fully compliant with the terms of his pre-trial release. Moreover, as the Court is aware, my client faces a very uncertain future in the United States.

I have discussed this motion with my counterparts at the government and they oppose the amendment. My client has not yet received any instructions as to which facility he should report to for surrender, and as far as we are aware, he has not yet been designated by the Bureau of Prisons.

Sincerely,

/s/

Matthew Galluzzo, Esq.

CC:

AUSA Emily Johnson

AUSA Kiersten Fletcher

VIA ECF

This request is denied. Defendant must surrender on November 29, 2021, as per the judgment.

SO ORDERED.  
Date: October 20, 2021  
New York, New York

  
JOHN P. CRONAN  
United States District Judge